

IH-32

Rev: 2014-1

United States District Court
for the
Southern District of New York
Related Case Statement

Full Caption of Later Filed Case:

SWISS REINSURANCE AMERICA CORP., ET AL.,

Plaintiff	Case Number
vs.	18-CV-12109
KINGDOM OF SAUDI ARABIA,	

Defendant

Full Caption of Earlier Filed Case:

(including in bankruptcy appeals the relevant adversary proceeding)

IN RE: TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

Plaintiff	Case Number
vs.	03-MDL-1570 (GBD)(SN)
Defendant	

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Status of Earlier Filed Case:

- Closed (If so, set forth the procedure which resulted in closure, e.g., voluntary dismissal, settlement, court decision. Also, state whether there is an appeal pending.)
- Open (If so, set forth procedural status and summarize any court rulings.)

The Honorable George B. Daniels presides over the pending MDL litigation, In Re Terrorist Attacks on September 11, 2001, 03 MDL1570. The case is complex and has a long procedural history of motion practice and appeals to the Second Circuit Court of Appeals and the United States Supreme Court. A number of defendants are currently in merits and jurisdictional discovery. Magistrate Sarah Netburn is overseeing discovery and related case management matters.

Explain in detail the reasons for your position that the newly filed case is related to the earlier filed case.

The plaintiffs identified in this newly filed action, Swiss Reinsurance America Corporation, Swiss Re International S.E., Westport Insurance Corporation, Swiss Re Europe S.A., and Swiss Reinsurance Company Ltd., are insurers and reinsurers that made payments on behalf of their insureds/cedents for the resolution of property damage, aviation liability and other claims related to the September 11th attacks. Plaintiffs in their "short form" complaint are asserting the factual allegations, jurisdictional allegations, jury trial demand and certain causes of action against The Kingdom of Saudi Arabia, as set forth in the complaint in Consolidated Amended Complaint as to the Kingdom of Saudi Arabia CAC, ECF No. 3463, which is part of the multi-district litigation docket number 03 MDL 1570.

As permitted and approved by the Order of Magistrate Judge Netburn, dated July 10, 2018, 03 MDL 1570, ECF No. 4045, this newly filed action is to be related to the 03 MDL 1570 action.

Signature:

Cahill Gordon & Reindel LLP

Date: December 21, 2018

Firm: